

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
: **LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (SCC)**
: **Debtors.** : **(Jointly Administered)**
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**ORDER GRANTING OBJECTION TO
PROOF OF CLAIM NUMBERS 64070 AND 64071**

Upon the objection to proof of claim numbers 67040 and 64071, dated August 22, 2014 (the “Objection”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”) for the entities, including Lehman Brothers Special Financing Inc. (“LBSF,” and with LBHI, “Lehman”), in the above-referenced chapter 11 cases, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), and Rule 3007(a) of the Federal Rules of Bankruptcy Procedure, seeking disallowance and expungement of proof of claim numbers 64070 and 64071 on the grounds that they assert claims for which Lehman has no liability, all as more fully described in the Objection; and due and proper notice of the Objection having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) Giants Stadium, LLC; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and the Court

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

having found and determined that the relief sought in the Objection is in the best interests of Lehman, its creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Objection is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, proof of claim numbers 64070 and 64071 are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2014
New York, New York

UNITED STATES BANKRUPTCY JUDGE